

# Morgan Lewis

**Andrew J. Gallo**  
Partner  
+1.617.951.8117  
andrew.gallo@morganlewis.com

January 28, 2016

**BY ECF**

The Honorable Colleen McMahon  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 1640  
New York, NY 10007-1312

**Re: Maricultura del Norte, S. de R.L. de C.V., et al. v.  
WorldBusiness Capital, Inc., et al., 14 Civ. 10143 (CM) (KNF) (S.D.N.Y.)**

Dear Judge McMahon:

We represent defendant WorldBusiness Capital, Inc. At the Initial Pretrial Conference in this matter held on March 27, 2015, Your Honor stayed all discovery pending decisions on the Defendants' motions to dismiss. The Court issued two Memorandum Decisions and Orders on November 25, 2015, granting in part and denying in part the motions to dismiss. Each of the Defendants answered Plaintiffs' complaint on January 8, 2016. Subject to Your Honor's approval, the parties have agreed to the Case Management Plan attached as Exhibit A to this letter. Pursuant to paragraph 3 of Your Honor's Order Scheduling an Initial Pretrial Conference (ECF No. 5) entered in this matter, the Defendants jointly request a conference with the Court to discuss the attached Case Management Plan given the claims that remain in this case following the Court's decision on the motions to dismiss.

Respectfully submitted,



Andrew J. Gallo

AJG/kas  
Enclosure

cc: All Counsel

**Morgan, Lewis & Bockius LLP**

One Federal Street  
Boston, MA 02110-1726  
United States

 +1.617.341.7700  
 +1.617.341.7701